

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ILKB, LLC

Plaintiff,

- VS -

MATTHEW WHITWORTH and TRAINING PASSION
LLC,

Defendant.

RULE 26(f) MEETING REPORT

Civil Action No. 1:20-cv-04900

RULE 26(f) MEETING REPORT

Have the parties met and conferred? Yes, on January 27, 2021.

Date the Rule 26(a)(1) initial disclosures were exchanged? February 1, 2021

Proposed Discovery Plan

1. Deadline for parties to provide properly executed authorizations/releases: April 1, 2021.
2. Deadline to join new parties or amend the pleadings: May 13, 2021.
3. Should any changes be made in the limitations on discovery imposed under the Federal Rules of Civil Procedure or by local rule? No.
4. Deadline to file any protective order: June 1, 2021.
5. The parties shall complete all fact discovery by: September 10, 2021.
6. The parties shall complete expert discovery, if necessary, by: November 8, 2021.
7. The parties shall file any pre-motion conference request by: December 10, 2021.
8. Should the Court hold an early settlement conference in this action? Yes.
9. Have the parties agreed to a plan regarding electronic discovery? Yes.

10. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. §636?5

(Answer no if any party declines to consent without indicating which party has declined). No

Respectfully submitted:

Dated: January 27, 2021.

GORDON REES SCULLY MANSUKHANI, LLP

By: s/ Peter G. Siachos

Peter G. Siachos, NY Bar #4436168

psiachos@grsm.com

1 Battery Park Plaza, 28th Floor

New York, NY 10004

Phone: (973) 549-2527

Fax: (973) 377-1911

Attorneys for Plaintiff ILKB

Dated: January 27, 2021.

EINBINDER & DUNN LLP

By: s/ Michael Einbinder

Michael Einbinder, NY Bar #

me@ed-lawfirm.com

112 Madison Ave., 8th Floor

New York, New York 10016

Phone: (212) 391-9500

Attorneys for Defendants